

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

LAMBDA OPTICAL SOLUTIONS, LLC,  
Plaintiff,  
  
v.  
  
ALCATEL-LUCENT SA, et al.,  
  
Defendants.

---

ALCATEL-LUCENT USA INC. and  
ALCATEL-LUCENT HOLDINGS INC.,  
  
Counterclaimants,  
  
v.  
  
LAMBDA OPTICAL SOLUTIONS LLC,  
LAMBDA OPTICAL SYSTEMS CORP., and  
ANASTASIOS TZATHAS,  
  
Counter-Defendants.

C.A. No. 10-487-RGA-CJB

## **STIPULATION AND PROPOSED ORDER**

The parties hereby stipulate and agree, subject to the approval of the Court, to modify certain deadlines for expert discovery as follows in order to accommodate a request for additional time to respond by Counter-Defendant Anastasios Tzathas and to accommodate scheduling difficulties for remaining depositions that relate to damages issues:

<b><u>EVENT</u></b>	<b><u>CURRENT DEADLINE</u></b>	<b><u>AMENDED DEADLINE</u></b>
Opening Damages Expert Reports	August 27, 2013	September 20, 2013
Rebuttal by Counter-Defendant Anastasios Tzathas To Alcatel-Lucent's Counterclaims Expert Report	August 30, 2013	September 20, 2013
Reply Expert Report by Alcatel-Lucent Relating to Alcatel-Lucent's Counterclaims Expert Report	September 17, 2013	October 8, 2013

Rebuttal Damages Expert Reports	September 30, 2013	October 23, 2013
Reply Damages Expert Reports	October 17, 2013	November 8, 2013
End of Expert Discovery For Alcatel-Lucent's Counterclaims Expert Report And Rebuttals Thereto	October 22, 2013	November 8, 2013
End of Damages Expert Discovery	November 14, 2013	November 22, 2013

ASHBY & GEDDES

/s/ Andrew C. Mayo

Steven J. Balick (No. 2114)  
Lauren E. Maguire (No. 4261)  
Andrew C. Mayo (No. 5207)  
500 Delaware Avenue, 8th Floor  
P.O. Box 1150  
Wilmington, DE 19899  
(302) 654-1888  
sbalick@ashby-geddes.com  
lmaguire@ashby-geddes.com  
amayo@ashby-geddes.com

*Attorneys for Lambda Optical Solutions, LLC  
and Lambda Optical Systems Corp.*

O'KELLY ERNST & BIELLI, LLC

/s/ George Pazuniak

George Pazuniak (No. 478)  
901 N. Market Street  
Suite 1000  
Wilmington, DE 19801  
(302) 478-4230  
GP@del-iplaw.com

*Attorneys for Anastasios Tzathas*

Dated: August 26, 2013

SHAW KELLER LLP

/s/ David M. Fry

John W. Shaw (No. 3362)  
Andrew E. Russell (No. 5382)  
David M. Fry (No. 5486)  
300 Delaware Avenue  
Suite 1120  
Wilmington, DE 19801  
(302) 298-0700  
jshaw@shawkeller.com  
arussell@shawkeller.com  
dfry@shawkeller.com

*Attorneys for Alcatel-Lucent USA Inc. and  
Alcatel-Lucent Holdings Inc.*

SO ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2013.

\_\_\_\_\_  
United States Magistrate Judge